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*Counsel for Defendants*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

**ELECTRONIC FRONTIER FOUNDATION,** )  
Plaintiff, ) Case No.: 4:09-cv-03351-SBA  
v. )  
**CENTRAL INTELLIGENCE AGENCY, et al.,** )  
Defendants. )  
Stipulation )  
No hearing requested )

The parties to this action, through their undersigned counsel, have conferred and have reached an agreement with respect to modification of the current deadlines, as set forth in the Court's Order of December 20, 2013 [ECF No. 84], to comply with the Court's Order of September 30, 2013 [ECF No. 81].

Pursuant to this stipulation, the parties agree to modification of the current deadlines to comply with the Court's Order of September 30, 2013, as follows:

1. Defendants the Department of Homeland Security, the Department of Defense, the National Security Agency, the Department of Justice, and the Office of the Director of National Intelligence shall release to Plaintiff the information that the Court has not determined

1 was properly withheld or serve Plaintiff with satisfactory supplemental *Vaughn* indices and  
2 declarations by no later than March 21, 2014.

3           2. In the event the parties are unable to resolve their disputes regarding any withheld  
4 information, the parties must submit the stipulation required by the Court's Order of September  
5 30, 2013, by no later than April 21, 2014.

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7 | Dated: February 14, 2014

Respectfully submitted,

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/s/ Kathryn C. Davis  
KATHRYN C. DAVIS (DC Bar #985055)  
*Counsel for Defendants*

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/s/ Jennifer Lynch  
JENNIFER LYNCH (SBN 240701)  
*Counsel for Plaintiff*

13 | DECLARATION PURSUANT TO L.R. 5.1

I, Kathryn C. Davis, hereby declare that I have obtained Jennifer Lynch's concurrence in the filing of this document.

16 Executed at Washington, D.C. this 14th day of February, 2014.

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20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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Dated:

**The Honorable SAUNDRA B. ARMSTRONG**  
United States District Judge

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1                   CERTIFICATE OF SERVICE

2                   I hereby certify that on February 14, 2014, I electronically filed the foregoing document  
3 with the Clerk of the Court, using the CM/ECF system, which will send notification of such  
4 filing to the counsel of record in this matter who are registered on the CM/ECF system.

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7                   /s/ Kathryn C. Davis  
8                   KATHRYN C. DAVIS  
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